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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

PLANNED PARENTHOOD FEDERATION OF
 AMERICA, INC.; PLANNED PARENTHOOD:
 SHASTA-DIABLO, INC., ET AL.

Plaintiffs,
 v.

CENTER FOR MEDICAL PROGRESS, ET AL.,
 Defendants.

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Case No. 3:16-cv-00236-WHO

**PLAINTIFFS' PROPOSED
 STIPULATION RE: LAW
 ENFORCEMENT CONTACTS**

Judge: Hon. William H. Orrick, III

1 The Court requested that the parties submit proposed stipulations regarding the
 2 Defendants' contacts with law enforcement. The evidence shows that Defendants cherry-picked
 3 both the law enforcement and government officials to whom they spoke, and the so-called
 4 evidence that they provided to such officials, which supports Plaintiffs' argument that Defendants
 5 did not go to law enforcement with the aim of prosecuting crimes, but instead, to further their
 6 goals to destroy Planned Parenthood. Defendants produced little in discovery regarding their
 7 contacts with law enforcement, so Plaintiffs cannot stipulate to the detailed lists of people and
 8 documents that Defendants included in their proposed stipulation. Dkt. 898. As requested by the
 9 Court, Plaintiffs propose the below stipulation regarding Defendants' contacts with law
 10 enforcement.

- 11 1. In approximately September 2014, David Daleiden provided information
 12 to the Maricopa County, Arizona District Attorney's Office regarding
 13 StemExpress, other tissue procurement organizations, and various non-
 Planned Parenthood abortion clinics.
- 14 2. On March 9, 2015, David Daleiden spoke on the phone with officials from
 15 the Oklahoma Attorney General's Office regarding non-Planned
 Parenthood organizations in Oklahoma.
- 16 3. On May 21 and 22, 2015, David Daleiden met with officials from the El
 17 Dorado County, California Sheriff's Office and the El Dorado County,
 18 California District Attorney's Office regarding StemExpress. Defendant
 Albin Rhomberg was also in attendance on May 21.
- 19 4. In approximately May 2015, David Daleiden gave other people
 20 information to provide to the Orange County, California District
 21 Attorney's Office regarding DaVinci Biosciences, DV Biologics, and
 various non-Planned Parenthood abortion clinics.
- 22 5. In May and June 2015, David Daleiden spoke with various members of
 23 Congress and their staff to explain the results of CMP's investigation.
- 24 6. Prior to June 26, 2015, David Daleiden spoke with officials from the
 25 Maricopa County, Arizona District Attorney's Office and Arizona
 26 Attorney General's Office regarding StemExpress, other tissue
 procurement organizations, PPFA, various non-Planned Parenthood
 abortion clinics, Tissue BioSource, and Advanced Tissue Services.
- 27 7. On June 26, 2015, David Daleiden spoke on the phone with officials from
 28 the Michigan Attorney General's Office regarding StemExpress, Planned
 Parenthood Federation of America, Planned Parenthood Mid-South

Michigan, and Northland Family Planning.

8. On July 3, 2015, David Daleiden spoke on the phone with officials from the Texas Attorney General's Office regarding StemExpress, Planned Parenthood Gulf Coast, Planned Parenthood Center for Choice, and Planned Parenthood Federation of America.

It is Plaintiffs' understanding that if the parties agree to a stipulation on this topic, the Defendants will not be allowed to discuss encounters with law enforcement that are not listed on the stipulation, and the parties will be precluded from questioning regarding the content of conversations with and the materials provided to law enforcement.

Dated: October 11, 2019

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Rhonda R. Trotter

Rhonda R. Trotter